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Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA)
MAPLEY,)

Plaintiffs,)

vs.)

WATCHTOWER BIBLE AND TRACT)
SOCIETY OF NEW YORK, INC.,)
WATCH TOWER BIBLE AND TRACT)
SOCIETY OF PENNSYLVANIA, and)
BRUCE MAPLEY SR.,)

Defendants,)

WATCHTOWER BIBLE AND TRACT)
SOCIETY OF NEW YORK, INC.,)
Cross Claimant,)

BRUCE MAPLEY, SR.,)
Cross Defendant.)

Case No. CV-20-52-BLG-SPW
**PLAINTIFFS' MOTION FOR
SANCTIONS**

Plaintiffs, by and through undersigned counsel, and pursuant to 28 U.S.C. § 1927 and the Court's inherent authority to sanction lawyers who abuse the judicial process, hereby move for sanctions to be imposed on Defendant Watch Tower Bible & Tract Society of Pennsylvania's attorneys, Philip Brumley, Esq., and Joel Taylor, for knowingly:

- Making and perpetuating false statements with the hope that they would be relied on by the Court to dismiss Plaintiffs' case; and
- Unreasonably and vexatiously multiplying these proceedings for the purpose of obstructing Plaintiffs' claims.

A supporting brief is being filed contemporaneously herewith.

Counsel for Defendants were contacted regarding this Motion and stated that they oppose it.

DATED 3rd day of December, 2021.

MEYER, SHAFFER & STEPANS PLLP

By: /s/ Ryan Shaffer
Ryan R. Shaffer
MEYER, SHAFFER & STEPANS PLLP
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

Pursuant to Local Rule 1.4, this document has been served on all parties via electronic service through the Court's Case Management/Electronic Case Filing (CM/ECF) system.

By: /s/ Ryan Shaffer
Ryan R. Shaffer
MEYER, SHAFFER & STEPANS PLLP
Attorneys for Plaintiffs